

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
WESTERN DIVISION**

**KARLA O'NELL NORAMBUENA  
et al.,**

**Plaintiffs,**

**vs.**

**WESTERN IOWA TECH  
COMMUNITY COLLEGE  
(WITCC) et al.,**

**Defendants.**

**CASE NO. 5:20-cv-4054-LTS-KEM**

**VOLUNTARY AND STIPULATED  
DISMISSAL WITH PREJUDICE  
PURSUANT TO FEDERAL RULE  
OF CIVIL PROCEDURE 41(a) FOR  
WITCC DEFENDANTS ONLY**

**COME NOW** Plaintiffs, through counsel, pursuant to Fed. R. Civ. P. 41(a)(1) and hereby dismiss all counts of the above captioned case against Defendants Western Iowa Tech Community College, Juline Albert, Rosana Salgado Burright, Lily Castro, James Zuercher, Terry Yi, and Terry Murrell ("WITCC DEFENDANTS") only with prejudice.

**PARRISH KRUIDENIER, L.L.P.**

By: /s/ Brandon Brown

Brandon Brown AT0001199

Benjamin D. Bergmann AT0009469

Jessica Donels AT0013389

2910 Grand Avenue

Des Moines, Iowa 50312

Telephone: (515) 284-5737

Facsimile: (515) 284-1704

[bbrown@parrishlaw.com](mailto:bbrown@parrishlaw.com)

[bbergmann@parrishlaw.com](mailto:bbergmann@parrishlaw.com)

[jdonels@parrishlaw.com](mailto:jdonels@parrishlaw.com)

**ATTORNEYS FOR PLAINTIFFS**

## **WITCC DEFENDANTS' STIPULATION**

**COME NOW**, the Defendants, Western Iowa Tech Community College, Juline Albert, Rosana Salgado Burright, Lily Castro, James Zuercher, Terry Yi, and Terry Murrell by and through their undersigned counsel, and hereby stipulate to the voluntary dismissal of claims against WITCC Defendants with prejudice without court order pursuant to Federal Rule of Civil Procedure 41(a)(ii).

*/s/ Scott Brennan*

Scott Brennan (AT0001100)

Sarah Franklin (AT0009630)

Elizabeth Van Arkel (AT0011370)

Katherine Gral (AT013357)

Spencer Willems (AT0014087)

DENTONS DAVIS BROWN

215 10th Street, Suite 1300

Des Moines, IA 50309

Telephone: (515) 288-2500

Facsimile: (515) 243-0654

Email: [scott.brennan@dentons.com](mailto:scott.brennan@dentons.com)

Email: [elizabeth.vanarkel@dentons.com](mailto:elizabeth.vanarkel@dentons.com)

Email: [katie.gral@dentons.com](mailto:katie.gral@dentons.com)

Email: [sarah.franklin@dentons.com](mailto:sarah.franklin@dentons.com)

Email: [spencer.willems@dentons.com](mailto:spencer.willems@dentons.com)

**PREMIER SERVICES DEFENDANTS' STIPULATION**

COME NOW, the Defendants, Premier Services, Inc., d/b/a J&L Enterprises, also d/b/a J&L Staffing and Recruiting Inc.; and Nancy Albrecht by and through their undersigned counsel, and hereby stipulate to the voluntary dismissal of Plaintiffs' claims against WITCC Defendants with prejudice without court order pursuant to Federal Rule of Civil Procedure 41(a)(ii).

/s/ Sarah J. Millsap

Sarah J. Millsap, #AT0007538

Brock J. Pohlmeier (admitted *pro hac vice*)

Ann L. Zebrowski, #AT0012033

JACKSON LEWIS P.C.

10050 Regency Circle, Suite 400

Omaha, NE 68114

Telephone: (402) 391-1991

Facsimile: (402) 391-7363

Email: [sarah.millsap@jacksonlewis.com](mailto:sarah.millsap@jacksonlewis.com)

[brock.pohlmeier@jacksonlewis.com](mailto:brock.pohlmeier@jacksonlewis.com)

[ann.zebrowski@jacksonlewis.com](mailto:ann.zebrowski@jacksonlewis.com)

### **TUR-PAK FOOD'S STIPULATION**

**COME NOW**, the Defendants, Tur-Pak Foods by and through their undersigned counsel, and hereby stipulate to the voluntary dismissal of claims against WITCC Defendants with prejudice without court order pursuant to Federal Rule of Civil Procedure 41(a)(ii).

/s/ Thomas Joensen

Thomas J. Joensen AT0003868

Tyler R. Smith AT0013123

GORDON REES SCULLY MANSUKHANI, LLP

1701 Ruan Center

666 Grand Avenue

Des Moines, IA 50309

Telephone: (515) 204-2845

Email: [tjoensen@grsm.com](mailto:tjoensen@grsm.com)

## **ROYAL CANIN USA INC.'S STIPULATION**

**COME NOW**, the Defendants, Royal Canin USA Inc. by and through their undersigned counsel, and hereby stipulate to the voluntary dismissal of Plaintiffs' claims against WITCC Defendants with prejudice without court order pursuant to Federal Rule of Civil Procedure 41(a)(ii).

/s/ Matthew J. Cannon

Matthew J. Cannon (Ill. Bar No. 6242637)

GREENBERG TRAURIG, LLP

77 West Wacker Drive, Suite 3100

Chicago, Illinois 60601

T: (312) 456-8400

F: (312) 456-8435

cannonm@gtlaw.com

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on 7/31/2024, I electronically filed the foregoing with the Clerk of Court using the ECF system and a true copy of the foregoing was served either electronically or by U.S. First Class Mail upon the following:

Scott Brennan

Email: [scott.brennan@dentons.com](mailto:scott.brennan@dentons.com)

Elizabeth Van Arkel

Email: [elizabeth.vanarkel@dentons.com](mailto:elizabeth.vanarkel@dentons.com)

Katherine Gral

Email: [katie.gral@dentons.com](mailto:katie.gral@dentons.com)

Sarah Franklin

Email: [sarah.franklin@dentons.com](mailto:sarah.franklin@dentons.com)

Spencer Willems

Email: [spencer.willems@dentons.com](mailto:spencer.willems@dentons.com)

ATTORNEYS FOR:

WITCC, TERRY YI, ROSANA SALGADO BURRIGHT, JULINE ALBERT, TERRY MURELL, JAMES ZUERCHER, and LILY CASTRO

Sarah Millsap

Email: [sarah.millsap@jacksonlewis.com](mailto:sarah.millsap@jacksonlewis.com)

Brock Pohlmeier

Email: [brock.pohlmeier@jacksonlewis.com](mailto:brock.pohlmeier@jacksonlewis.com)

ATTORNEYS FOR

PREMIER SERVICES, INC. and  
NANCY ALBRECHT

Matthew Dixon

Email: [mdixon@grsm.com](mailto:mdixon@grsm.com)

Thomas Joensen

Email: [tjoensen@grsm.com](mailto:tjoensen@grsm.com)

Ryan T Brown

Email: [rtbrown@grsm.com](mailto:rtbrown@grsm.com)

ATTORNEYS FOR TUR-PAK FOODS

Ryland Deinert

Email: [deinert@klasslaw.com](mailto:deinert@klasslaw.com)

Pro Hac Vice - Elizabeth Ralph

Email: [ralphe@gtlaw.com](mailto:ralphe@gtlaw.com)

Pro Hac Vice – Matthew Cannon

Email: [cannonm@gtlaw.com](mailto:cannonm@gtlaw.com)

ATTORNEYS FOR ROYAL CANIN USA INC

/s/ Alexandra Dea

Legal Assistant to Brandon Brown